

IN THE UNITED STATES BANKRUPTCY COURT

FOR THE WESTERN DISTRICT OF TEXAS

EL PASO DIVISION

IN RE:	* Chapter 13
	*
James Harley II and wife	*
Juanita Harley	*
	*
Debtors	*
	* BANKRUPTCY # 09-30327

DEBTORS' RESPONSE TO MOTION  
FOR RELIEF FROM STAY FILED BY  
HSBC MORTGAGE SERVICES INC.

TO THE HONORABLE BANKRUPTCY JUDGE:

Comes now, James Harley II and wife, Juanita Harley, Debtors herein, by and through their attorneys, Edgar Borrego/Miguel Flores/Sol M. Cortez, and respectfully filed their Response to the Motion for Relief from Stay, filed herein by, HSBC MORTGAGE SERVICES INC., and would show the Court as follows:

I.

Debtor(s) admit with the provisions in Movant's paragraph 1.

II.

Debtor(s) admit with the provisions in Movant's paragraph 2.

III.

Debtor(s) admit with the provisions in Movant's paragraph 3.

IV.

Debtor(s) admit with the provisions in Movant's paragraph 4.

V.

Debtor(s) admit with the provisions in Movant's paragraph 5.

VI.

Debtor(s) admit with the provisions in Movant's paragraph 6.

VII.

Unable to admit or deny the provisions in Movant's paragraph 7 at this time. We will provide additional information, as it becomes available.

VIII.

Unable to admit or deny the provisions in Movant's paragraph 8 at this time. We will provide additional information, as it becomes available.

IX.

Unable to admit or deny the provisions in Movant's paragraph 9 at this time. We will provide additional information, as it becomes available.

X.

Unable to admit or deny the provisions in Movant's paragraph 10 at this time. We will provide additional information, as it becomes available.

XI.

Unable to admit or deny the provisions in Movant's paragraph 11 at this time. We will provide additional information, as it becomes available.

XII.


Unable to admit or deny the provisions in Movant's paragraph 12 at this time. We will provide additional information, as it becomes available.

WHEREFORE, PREMISES CONSIDERED, Debtors pray that on a hearing of these matters, that the Court deny the Motion for Relief from Stay, in its entirety.

DATED this the 9 day of September, 2010.

Respectfully submitted,

TANZY & BORREGO LAW OFFICES  
2610 Montana Avenue  
El Paso, Texas 79903-3712  
(915) 566-4300

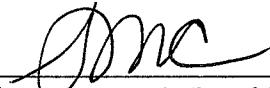
By:   
EDGAR J. BORREGO SBN#00787107  
MIGUEL FLORES SBN#24036574  
SOL M. CORTEZ SBN#24071080  
Attorneys for Tanzy & Borrego Law Offices

CERTIFICATE OF SERVICE

I hereby certify that I have served upon the following parties via electronic means as listed on the court's ECF noticing system or by regular first class mail a true and correct copy of the foregoing instrument to Mr. Stuart C. Cox, Chapter 13 Trustee, 1760 N. Lee Trevino Dr., El Paso, TX 79936, to the Debtors, Mr. & Mrs. James Harley II and wife, 3020 Camarena Place, El Paso, TX 79936, and to Lisa L. Cockrell, Attorney(s) for, HSBC MORTGAGE SERVICES INC., 650 N. Sam Houston Parkway East, Suite 450, Houston, TX 77060.

DATED this the 9 day of September, 2010.

Respectfully submitted,



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Edgar Borrego/Miguel Flores/Sol M. Cortez  
Attorneys for Tanzy & Borrego Law Offices

TB#26476/GO